

TABLE OF CLAIM TERMS**JOINT CLAIM CONSTRUCTION STATEMENT**

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	'312 Patent: claims 14 and 19	<p><i>arm that is operable to lift a cutting deck assembly.</i></p> <p>This limitation does not recite, and therefore does not require, a generally L-shaped arm; a horizontally-extending arm; an arm having an inner end pivotally connected to the frame; an arm having an outer end pivotally connected to the deck assembly; an arm that provides pivotal movement about a generally vertical axis; an arm that provides pivotal movement about a generally horizontal axis extending in the forward-rearward direction; or any other unrecited limitations.</p>	<p>Intrinsic Evidence:</p> <p>Specifications:</p> <p>Summary of the Invention:</p> <p>"The invention also provides an improved arrangement for mounting a rotary cutting deck on a lawn mower frame. Each deck is mounted on its own lifting arm so that the deck can move vertically relative to the frame and can pivot relative to the frame about three mutually perpendicular axes." Col. 1:31-37.</p> <p>"Each deck assembly is connected to the frame by a generally L-shaped, horizontally-extending lifting arm operable to lift the deck assembly relative to the frame. Each deck assembly is connected to the frame by its own lifting arm. Each lifting arm has an inner end pivotally connected to the frame. A cross member is mounted on the outer end of the lifting arm for pivotal movement about a generally vertical axis and about a generally horizontal axis extending in the forward-rearward direction. One end of the cross member is connected to one of the deck assembly side plates for pivotal movement about a generally horizontal, laterally-extending axis adjacent the forward ends of the side plates, and the other end of the cross member is connected to the other side plate for pivotal movement about the same axis."</p> <p>Intrinsic Evidence</p> <p>Patent Specifications:</p> <p>‘530 Patent col. 1, ll. 34-37: "Each deck is mounted on its own lifting arm so that the deck can move vertically relative to the frame and can pivot relative to the frame about three mutually perpendicular axes."</p> <p>‘530 Patent col. 1, ll. 57-62: "Each deck assembly is connected to the frame by a generally L-shaped, horizontally-extending lifting arm operable to lift the deck assembly relative to the frame. Each deck assembly is connected to the frame by its own lifting arm. Each lifting arm has an inner end pivotally connected to the frame."</p> <p>‘530 Patent col. 3, l. 66 - col. 4, l. 7: "Each of the deck assemblies 34 is mounted on the frame 12 by a generally L-shaped, horizontally-extending lifting arm 112, such that each deck assembly is mounted on its own lifting arm 112. The lifting arm 112 has (see FIGS. 2 and 3) a laterally-extending inner leg 116</p>

TABLE OF CLAIM TERMSJOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		with an inner end connected to the frame 12 for pivotal movement about a generally horizontal axis 120 extending in the forward-rearward direction. The arm 112 also has an outer leg 124 extending in the forward-rearward direction.”	Col. 1:57 – Col. 2:3. “This construction enables the lawn mower to cut the undulating terrain of a golf course rough and to be controlled for close trimming.” Col. 2:4-6.
		Description of the Drawings: ‘530 Patent col. 4, ll. 20-31: “A hydraulic assembly 148 (partially shown only in FIG. 5) connected between the arm 112 and the frame 12 pivots the arm about the axis 120 for lifting and lowering the deck 38. When the deck is lowered for cutting, the hydraulic assembly allows the lifting arm to “float,” thereby allowing the deck 38 to move vertically relative to the frame 12. The connection of the deck 38 to the arm 112 via the cross member 128 allows the deck 38 to pivot relative to the frame 12 about the three mutually perpendicular axes 132, 136 and 144. This mounting arrangement enables the deck 38 to adjust to undulating terrain, thereby substantially avoiding scalping.”	Figures 1-6 are incorporated herein.
		Description of the Preferred Embodiment: ‘530 Patent Claim 3 (col. 5, ll. 5-9): “3. A lawn mower as set forth in claim 1 wherein each deck assembly is connected to the frame by a respective lifting arm operable to lift the associated deck assembly relative to the frame, such that each of the deck assemblies is connected by its own lifting arm to the frame.”	“Each of the deck assemblies 34 is mounted on the frame 12 by a generally L-shaped, horizontally-extending lifting arm 112, such that each deck assembly is mounted on its own lifting arm 112. The lifting arm 112 has (see FIGS. 2 and 3) a laterally-extending inner leg 116 with an inner end connected to the frame 12 for pivotal movement about a generally horizontal axis 120 extending in the forward-rearward direction. The arm 112 also has an outer leg 124 extending in the forward-rearward direction. A cross member 128 is mounted on the outer end of the outer leg 124 for pivotal movement about a generally vertical axis 132 and about a generally horizontal axis 136 extending in the forward-rearward direction. Each of the opposite, laterally-spaced ends of the cross member 128 has thereon (see FIGS. 2, 3, 5 and 6) a downwardly and slightly rearwardly extending arm 140. The lower end of one arm 140 is connected to the side plate 46 for pivotal movement about a generally horizontal, laterally-extending axis 144 adjacent the forward ends of the side plates 46 and 48. The lower end of the other arm 140 is connected to the side plate 48 for

TABLE OF CLAIM TERMS**JOINT CLAIM CONSTRUCTION STATEMENT**

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		with frame 12. Each lifting arm 176 includes a first end 178 pivotally coupled to deck 160 and a second end 180 pivotally coupled to frame 12. Specifically, first end 178 cooperates with a pin 182 to define an axis of rotation 184 extending laterally across deck 160 perpendicular to the forward-rearward direction of travel. Pin 182 rotatably couples second end 180 to a bracket 186.”	pivotal movement about the axis 144.” Col. 3:66 – Col. 4:19. “A hydraulic assembly 148 (partially shown only in FIG. 5) connected between the arm 112 and the frame 12 pivots the arm about the axis 120 for lifting and lowering the deck 38. When the deck is lowered for cutting, the hydraulic assembly allows the lifting arm to “float,” thereby allowing the deck 38 to move vertically relative to the frame 12. The connection of the deck 38 to the arm 112 via the cross member 128 allows the deck 38 to pivot relative to the frame 12 about the three mutually perpendicular axes 132, 136 and 144. This mounting arrangement enables the deck 38 to adjust to undulating terrain, thereby substantially avoiding scalping.” Col. 4:20-31.
		‘312 Patent col. 6, ll. 13-19; ‘Second end 180 of lifting arm 176 includes a third pin 194 pivotally interconnecting lifting arm 176 with frame 12. Pin 194 defines an axis 196 laterally extending across mower 154. As earlier described with reference to FIG. 5, a hydraulic assembly 148 connected between lifting arm 176 and frame 12 pivots the arm about axis 196 for lifting and lowering deck 160.’	‘312 Patent:
		‘530 Patent Figs. 1-5, and 7-24; Illustrating embodiments of lifting arms.	“Each of the deck assemblies includes a lifting arm 176 to pivotally interconnect each of the deck assemblies with frame 12. Each lifting arm 176 includes a first end 178 pivotally coupled to deck 160 and a second end 180 pivotally coupled to frame 12. Specifically, first end 178 cooperates with a pin 182 to define an axis of rotation 184 extending laterally across deck 160 perpendicular to the forward-rearward direction of travel. Pin 182 rotatably couples second end 180 to a bracket 186. Bracket 186 is in turn pivotally coupled to a pair of stanchions 188 extending from deck 160. A second pin 190 rotatably interconnects bracket 186 and stanchions 188 for rotation about an axis 192 longitudinally extending in the forward-rearward direction of the mower 154.” Col. 5:65 – Col. 6:12.
		‘530 Patent Claim 8 (col. 6, ll. 18-64); Claim 8 recites “... wherein each of the deck assemblies is connected to the frame by a respective generally L-shaped, horizontally-extending arm having a laterally-extending inner leg with an inner end connected to the frame for pivotal movement about a generally horizontal axis extending in the forward-rearward direction, and the arm having an outer leg	

TABLE OF CLAIM TERMSJOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		<p>extending in the forward-rearward direction, the outer leg having an outer end, and wherein the cross member is mounted on the outer end of the outer leg.” The doctrine of claim differentiation requires this limitation to be different in scope from the term “lifting arm” as it is used in claim 3.</p> <p><u>‘530 Patent Claim 10 (col. 7, ll. 1-42):</u> Claim 10 recites “ . . . wherein the deck assembly is connected to the frame by a generally L-shaped, horizontally-extending arm having a laterally-extending inner leg with an inner end connected to the frame for pivotal movement about a generally horizontal axis extending in the forward-rearward direction, and the arm having an outer leg extending in the forward-rearward direction, the outer leg having an outer end, and wherein the cross member is mounted on the outer end of the outer leg.” The doctrine of claim differentiation requires this limitation to be different in scope from the term “lifting arm” as it is used in claim 3.</p> <p><u>Claims:</u></p> <p><u>‘530 Patent:</u></p>	<p>“Second end 180 of lifting arm 176 includes a third pin 194 pivotally interconnecting lifting arm 176 with frame 12. Pin 194 defines an axis 196 laterally extending across mower 154. As earlier described with reference to FIG. 5, a hydraulic assembly 148 connected between lifting arm 176 and frame 12 pivots the arm about axis 196 for lifting and lowering deck 160.” Col. 6:13-19.</p> <p>Claim 3 (relevant representative portions):</p> <p>“each deck assembly is connected to the frame by a respective lifting arm operable to lift the associated deck assembly relative to the frame, such that each of the deck assemblies is connected by its own lifting arm to the frame.” Col. 5:5-9.</p> <p>Claim 17 (relevant representative portions):</p> <p>“each of the deck assemblies being connected to the frame by a respective generally L-shaped, horizontally-extending lifting arm operable to lift the associated deck assembly relative to the frame, such that each of the deck assemblies is connected by its own lifting arm to the frame, each arm having a laterally-extending inner leg with an inner end connected to the frame for pivotal movement about a generally horizontal axis extending in the forward-rearward direction, and each arm having an outer leg extending in the forward-rearward direction . . . ” The separate, additional</p> <p>“each of the deck assemblies being connected to the frame by a respective generally L-shaped, horizontally-extending lifting arm operable to lift the associated deck assembly relative to the frame, such that each of the deck assemblies is connected by its own lifting arm to the frame, each arm having a laterally-extending inner leg with an inner end connected to the frame for pivotal movement about a generally horizontal axis extending in the forward-rearward direction, and each arm having an outer leg extending in the forward-rearward direction in the forward-rearward direction, the outer</p>

TABLE OF CLAIM TERMS**JOINT CLAIM CONSTRUCTION STATEMENT**

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		recitation of structures relating to the lifting arm demonstrates that the term "lifting arm" does not, in and of itself, include these limitations. If it did, claim 17 would be redundant.	leg having an outer end, and a cross member mounted on the outer end of the outer leg for pivotal movement about a generally vertical axis and about a generally horizontal axis extending in the forward-rearward direction, the cross member having opposite, laterally-spaced ends, one of the cross member ends being connected to one of the side plates of the associated deck assembly for pivotal movement about a generally horizontal, laterally-extending axis adjacent the forward ends of the side plates, and the other of the cross member ends being connected to the other of the side plates of the associated deck assembly for pivotal movement about the generally horizontal, laterally-extending axis." Col. 9:19-Col. 10:12.

'311 Patent

Claim 3 and 11 (relevant representative portions):

"each deck assembly is connected to said frame by a respective lifting arm operable to lift the associated deck assembly relative to said frame, such that each of said deck assemblies is connected by its own lifting arm to said frame." Col. 5:18-22; Col. 6:34-38.

'312 Patent:

Claim 14 (relevant representative portions):

"The lawn mower of claim 1 further including a lifting arm pivotally interconnecting each of said front deck assemblies to said frame, said lifting arm pivoting about an axis laterally extending across said

TABLE OF CLAIM TERMS**JOINT CLAIM CONSTRUCTION STATEMENT**

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
			<p>deck assembly substantially parallel to the ground and perpendicular to the direction of travel.” Col. 9:17-22.</p> <p>Claim 19 (relevant representative portions):</p> <p>“a lifting arm adapted to pivotally interconnect said cutting deck assembly and the frame.” Col. 10:4-5.</p> <p><u>Prosecution History:</u></p> <p><u>'530 Patent:</u></p> <p>Paper 4, at p. 4. Paper 6, p. 12.</p>
8.	“Side plates”		<p><u>Proposed Construction</u></p> <p>The words in this phrase use their ordinary and accustomed meaning and require no construction by the Court. However, if the Court determines that they do require construction, “side plates” means: <i>plate-like components on each side of the deck assembly.</i></p> <p><u>Specification</u></p> <p>This limitation does not recite, and therefore does not require, the “side plates” to be generally vertically-extending from the rear roller to the front wheels, and does not have any other unrecited limitations.</p> <p><u>Intrinsic Evidence</u></p> <p>‘530 Patent: claim 4 ‘311 Patent: claims 4 and 12 ‘312 Patent: claim 19</p> <p>Thin, flat pieces of metal laterally-spaced and generally vertically-extending from the rear roller to the front wheels.</p> <p><u>Intrinsic Evidence</u></p> <p>“Each of the front and rear deck assemblies includes a pair of laterally-spaced, generally vertically-extending side plates, front wheels supporting the side plates for movement over the ground” Col.</p>

TABLE OF CLAIM TERMSJOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	Patent Term	Patent Specifications:	
		<p>‘530 Patent col. 1, ll. 44-54; “Each of the front and rear deck assemblies includes a pair of laterally-spaced, generally vertically-extending side plates, front wheels supporting the side plates for movement over the ground, and a rear roller extending between the side plates and supporting the side plates for movement over the ground. Each deck assembly also includes a single-spindle cutting deck located between the side plates and in front of the roller, the deck being mounted on the side plates such that the height of the deck relative to the ground is adjustable.”</p> <p>‘530 Patent col. 1, ll. 65 - col. 2, ll. 3: “One end of the cross member is connected to one of the deck assembly side plates for pivotal movement about a generally horizontal, laterally-extending axis adjacent the forward ends of the side plates, and the other end of the cross member is connected to the other side plate for pivotal movement about the same axis.”</p>	<p>1:45-47.</p> <p><u>Detailed Description of the Preferred Embodiment:</u></p> <p>“Two front wheels 50 rotate about an axle 54 (FIGS. 2 and 3) extending between the side plates 46 and 48 in front of the deck 38, such that each front wheel 50 supports one of the side plates 46 and 48 and the deck 38 for movement over the ground.” Col. 3:13-18.</p> <p>“A rear roller 58 extends between the side plates 46 and 48 and also supports the side plates 46 and 48 and the deck 38 for movement over the ground.” Col. 3:17-19.</p> <p><u>‘312 Patent Specification:</u></p> <p>“With reference to FIGS. 9 and 10, each of the cutting deck assemblies 156 and 158 includes a single spindle mulching deck 160 defining a downwardly opening space. Deck 160 is supported by a pair of laterally spaced, generally vertically extending side plates 162 and 164. Two caster wheels 166 are pivotally coupled to a cross-arm 168 extending between side plates 162 and 164, such that each caster wheel 166 supports one of the side plates 162 and 164 and the deck 160 for movement over the ground.” Col. 5:56.</p> <p>“Accordingly, rollers 236 support the side plates and a deck 245 for movement over the ground.” Col. 7:3-5.</p> <p>“As shown in FIG. 15, another embodiment 250 of a</p>

TABLE OF CLAIM TERMSJOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		<p>48 and also supports the side plates 46 and 48 and the deck 38 for movement over the ground.”</p> <p><u>'530 Patent col. 3, ll. 22-44:</u> “The deck 38 is mounted on the side plates 46 and 48 such that the height of the deck 38 relative to the ground is adjustable. In the illustrated construction, the deck 38 includes spaced deck plates 66 and 68 (FIGS. 3 and 5) extending upwardly adjacent the side plates 46 and 48, respectively. The upper end of each side plate 46 or 48 has thereon (see FIG. 2) generally horizontal, inwardly-extending ears 69 and 70, with the ear 69 adjacent the front of the side plate and the ear 70 adjacent the rear of the side plate. Fixed to the ears 69 and 70 of each side plate 46 or 48 is an elongated plate member 71 having outwardly-extending ears 72 and 73 respectively secured to the ears 69 and 70 by suitable means such as bolts or screws 74. Each side plate 46 or 48 and the corresponding plate member 71 has thereon (see FIGS. 4 and 6) a series of holes 76. Each of the deck plates 66 and 68 has therein several vertically-spaced series of holes 78. Bolts 80 extending through holes 76 in the side plates 46 and 48 and in the plate members 71 and through holes 78 in the deck plates 66 and 68 secure the deck 38 to the side plates 46 and 48. The height of the deck 38 is adjusted by changing the holes 78 in the deck plates 66 and 68 and/or the holes in the side plates 46 and 48 and in the plate members 71 through which the bolts 80 extend.”</p>	<p>cutting deck assembly includes a pair of rear wheels 252 coupled to a pair of side plates 254 and 256, respectively. Rear wheels 252 function to support side plates 254 and 256 along with a mower deck 258 for movement over the ground.” Col. 7:13-18.</p> <p>“Another cutting deck embodiment 290 is depicted in FIG. 19. Cutting deck assembly 290 includes a plurality of front caster wheels 292 pivotally coupled to a actuate cross member 294 interconnecting a first side plate 296 and a second side plate 298.” Col. 7:43-47.</p> <p>“Rear wheels 302 are pivotally coupled to each of the side plates 296 and 298. Each of the segments of segmented rear roller assembly 304 are rotatably coupled and aligned along an axle 306.” Col. 7:55-58</p> <p>“FIG. 20 depicts yet another cutting deck assembly 308 having a stepped and segmented rear roller assembly 310. Rear roller assembly 310 includes a pair of outboard rollers 312 coupled to side plates 314 and 316. Rear roller assembly 310 also includes an inboard set of rollers 318 positioned between side plates 314 and 316 and rotatably mounted on a stepped axle shaft 320.” Col. 7:59-65.</p>
			<p>Patent Claims:</p> <p><u>'530 Patent:</u></p> <p>Claim 4 (relevant representative portions):</p> <p>“A lawn mower as set forth in claim 1 wherein each</p>

TABLE OF CLAIM TERMSJOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
	side plates 46 and 48. The lower end of the other arm 140 is connected to the side plate 48 for pivotal movement about the axis 144.”	'530 Patent Figs. 2-6: Illustrating side plates (46, 48). '312 Patent col. 5, ll. 50-63: “Deck 160 is supported by a pair of laterally spaced, generally vertically extending side plates 162 and 164. Two caster wheels 166 are pivotally coupled to a cross-arm 168 extending between side plates 162 and 164, such that each caster wheel 166 supports one of the side plates 162 and 164 and the deck 160 for movement over the ground. Each of the caster wheels 166 is coupled to cross-arm 168 via a caster shaft 170. Accordingly, each of caster wheels 166 may rotate about an axle shaft 172 and also pivot about caster shaft 170 when the vehicle is turning. A continuous, unitary roller 174 extends between side plates 162 and 164 and also supports side plates 162 and 164 and deck 160 for movement over the ground.”	<p>of the front and rear deck assemblies includes a pair of laterally-spaced, generally vertically-extending side plates having forward ends, a first front wheel supporting one of the side plates for movement over the ground, and a second front wheel supporting the other of the side plates for movement over the ground, wherein the rear roller extends between the side plates and supports the side plates for movement over the ground, wherein the associated deck is located between the side plates and in front of the roller and is mounted on the side plates such that the height of the deck relative to the ground is adjustable by changing the position of the deck relative to the side plates. Col. 5:9-22.</p> <p>Claim 7 (relevant representative portions):</p> <p>“one of the cross member ends being connected to one of the side plates of the associated deck assembly for pivotal movement about a generally horizontal, laterally-extending axis adjacent the forward ends of the side plates, and the other of the cross member ends being connected to the other of the side plates of the associated deck assembly for pivotal movement about the generally horizontal, laterally-extending axis, the ends of the cross member having thereon respective downwardly extending arms, the arms having respective lower ends, the lower end of one of the arms being connected to one of the side plates for pivotal movement about the generally horizontal, Col. 6:1-16.</p> <p>Claim 8 (relevant representative portions):</p> <p>“one of the cross member ends being connected to</p>

TABLE OF CLAIM TERMS**JOINT CLAIM CONSTRUCTION STATEMENT**

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		<p>roller 204 is aligned laterally with second roller 200. Third roller 204 is coupled to a side plate 205 and generally aligned with an outside edge of deck 201.”</p> <p><i>‘312 Patent col. 6, l. 66 - col. 7, l. 12:</i> “Another cutting deck assembly is depicted at reference numeral 234 in FIG. 13. Cutting deck assembly 234 includes a plurality of separate rollers 236 aligned and rotatably mounted to axle 238. Axle 238 is coupled to a first side plate 242 and a second side plate 244. Accordingly, rollers 236 support the side plates and a deck 245 for movement over the ground. ... In similar fashion and in reference to FIG. 14, a single one-piece unitary roller 246 may be incorporated to support the side plates and deck.”</p>	<p>one of the side plates of the associated deck assembly for pivotal movement about a generally horizontal, laterally-extending axis adjacent the forward ends of the side plates, and the other of the cross member ends being connected to the other of the side plates of the associated deck assembly for pivotal movement about the generally horizontal” Col. 6:1-8.</p> <p>Claim 12 (relevant representative portions):</p> <p>A lawn mower as set forth in claim 12 wherein the deck assembly also includes a first front wheel supporting one of the side plates for movement over the ground, a second front wheel supporting the other of the side plates for movement over the ground, and a rear roller extending between the side plates and supporting the side plates for movement over the ground, Col. 8:28-30.</p> <p><u>‘312 Patent:</u></p> <p>Claim 19 (relevant representative portions):</p> <p>“a pair of laterally-spaced, generally vertically extending side plates having forward ends;</p> <p>a first front wheel supporting one of said side plates for movement over the ground;</p> <p>a second front wheel supporting the other of said side plates for movement over the ground;</p> <p>a roller extending between said side plates supporting said side plates for movement over the ground, wherein said deck is coupled to said side plates and</p>

TABLE OF CLAIM TERMS**JOINT CLAIM CONSTRUCTION STATEMENT**

#	Claim Term	<u>Plaintiff's Proposed Construction</u>	<u>Defendant's Proposed Construction</u>
		<p>caster pin 300. ... Cutting deck 290 also includes a pair of rear wheels 302 and a rear segmented roller assembly 304. Rear wheels 302 are pivotally coupled to each of the side plates 296 and 298. Each of the segments of segmented rear roller assembly 304 are rotatably coupled and aligned along an axle 306.”</p> <p>‘312 Patent col. 7, ll. 59-65: “FIG. 20 depicts yet another cutting deck assembly 308 having a stepped and segmented rear roller assembly 310. Rear roller assembly 310 includes a pair of outboard rollers 312 coupled to side plates 314 and 316. Rear roller assembly 310 also includes an inboard set of rollers 318 positioned between side plates 314 and 316 and rotatably mounted on a stepped axle shaft 320.”</p> <p>‘312 Patent Figs. 2-9, and 11-24; Illustrating various embodiments of side plates.</p>	<p>located in front of said roller such that the height of said deck relative to the ground is adjustable by changing the position of said deck relative to said side plates” Col. 9:38 - Col. 10:3.</p>
9.	“rear roller extends between the side plates and supports the side plates for movement over the ground”	<p><u>Proposed Construction</u></p> <p>The words in this phrase use their ordinary and accustomed meaning and require no construction by the Court. However, if the Court determines that they do require construction, “rear roller extends between the side plates and supports the side plates for movement over the ground” means: <u>the rear roller extends between the side plates in such a way to support them for movement over the ground.</u></p> <p><u>530 Patent:</u> claim 4 <u>311 Patent:</u> claims 4 and 12 <u>312 Patent:</u> claim 19</p>	<p><u>Proposed Construction</u></p> <p>Thin, flat pieces of metal laterally-spaced and generally vertically-extending from the rear roller to the front wheels.</p> <p><u>Intrinsic Evidence</u></p> <p><u>Specification</u></p> <p><u>Summary of the Invention:</u></p> <p>“Each of the front and rear deck assemblies includes a pair of laterally-spaced, generally vertically-extending side plates, front wheels supporting the side plates for movement over the ground” Col.</p>

TABLE OF CLAIM TERMSJOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction <u>Intrinsic Evidence</u>	Defendant's Proposed Construction
		<p>Patent Specifications:</p> <p><u>'530 Patent col. 1, ll. 44-56:</u> "Each of the front and rear deck assemblies includes a pair of laterally-spaced, generally vertically-extending side plates, front wheels supporting the side plates for movement over the ground, and a rear roller extending between the side plates and supporting the side plates for movement over the ground. ... The roller extends across substantially the entire width of the deck. The roller resists scalping and stripes the grass, both of which are aesthetically desirable."</p> <p><u>'530 Patent col. 3, ll. 16-21:</u> "A rear roller 58 extends between the side plates 46 and 48 and also supports the side plates 46 and 48 and the deck 38 for movement over the ground. The roller 58 is behind the deck 38 and extends across substantially the entire width of the deck 38. The roller 58 resists scalping and stripes the grass."</p> <p><u>'530 Patent Figs. 2, 3 & 5:</u> Showing a roller (58) attached to side plates (46, 48) by an axle (unnumbered).</p> <p><u>'312 Patent col. 5, ll. 60-65:</u> "A continuous, unitary roller 174 extends between side plates 162 and 164 and also supports side plates 162 and 164 and deck 160 for movement over the ground. In this embodiment, roller 174 is positioned behind deck 160 and extends substantially across the entire width of deck 160." Col. 5:60-65.</p> <p><u>'312 Patent col. 6, ll. 20-33:</u> "An alternate</p>	<p>Detailed Description of the Preferred Embodiment:</p> <p>"Two front wheels 50 rotate about an axle 54 (FIGS. 2 and 3) extending between the side plates 46 and 48 in front of the deck 38, such that each front wheel 50 supports one of the side plates 46 and 48 and the deck 38 for movement over the ground." Col. 3:13-18.</p> <p>"A rear roller 58 extends between the side plates 46 and 48 and also supports the side plates 46 and 48 and the deck 38 for movement over the ground." Col. 3:17-19.</p> <p><u>'312 Patent Specification:</u></p> <p>"With reference to FIGS. 9 and 10, each of the cutting deck assemblies 156 and 158 includes a single spindle mulching deck 160 defining a downwardly opening space. Deck 160 is supported by a pair of laterally spaced, generally vertically extending side plates 162 and 164. Two caster wheels 166 are pivotally coupled to a cross-arm 168 extending between side plates 162 and 164, such that each caster wheel 166 supports one of the side plates 162 and 164 and the deck 160 for movement over the ground." Col. 5:5-6.</p> <p>"Accordingly, rollers 236 support the side plates and a deck 245 for movement over the ground." Col. 7:3-5.</p> <p>"As shown in FIG. 15, another embodiment 250 of a</p>

TABLE OF CLAIM TERMS**JOINT CLAIM CONSTRUCTION STATEMENT**

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		<p>embodiment cutter deck assembly 198 is depicted in FIG. 11. A segmented first roller 200 is positioned behind a deck 201 laterally extending a distance less than the width of deck 201. Segmented roller 200 includes a plurality of roller segments 200A, 200B, 200C and 200D. . . . A second roller 202 is positioned forward of first roller 200. Second roller 202 is coupled to a side plate 203 and generally aligned with an outside edge of deck 201. A third roller 204 is aligned laterally with second roller 202 and positioned forward of first roller 200. Third roller 204 is coupled to a side plate 205 and generally aligned with an outside edge of deck 201..”</p> <p><u>'312 Patent col. 6, l. 66 - col. 7, l. 5:</u> “Another cutting deck assembly is depicted at reference numeral 234 in FIG. 13. Cutting deck assembly 234 includes a plurality of separate rollers 236 aligned and rotatably mounted to axle 238. Axle 238 is coupled to a first side plate 242 and a second side plate 244. Accordingly, rollers 236 support the side plates and a deck 245 for movement over the ground.”</p>	<p>“Another cutting deck embodiment 290 is depicted in FIG. 19. Cutting deck assembly 290 includes a plurality of front caster wheels 292 pivotally coupled to a actuate cross member 294 interconnecting a first side plate 296 and a second side plate 298.” Col. 7:43-47.</p> <p>“Rear wheels 302 are pivotally coupled to each of the side plates 296 and 298. Each of the segments of segmented rear roller assembly 304 are rotatably coupled and aligned along an axle 306.” Col. 7:55-58</p> <p>“FIG. 20 depicts yet another cutting deck assembly 308 having a stepped and segmented rear roller assembly 310. Rear roller assembly 310 includes a pair of outboard rollers 312 coupled to side plates 314 and 316. Rear roller assembly 310 also includes an inboard set of rollers 318 positioned between side plates 314 and 316 and rotatably mounted on a stepped axle shaft 320.” Col. 7:59-65.</p> <p>Patent Claims:</p> <p><u>'530 Patent:</u></p> <p>Claim 4 (relevant representative portions):</p> <p>“A lawn mower as set forth in claim 1 wherein each</p>
		<p><u>'312 Patent col. 7, ll. 13-21:</u> “As shown in FIG. 15, another embodiment 250 of a cutting deck assembly includes a pair of rear wheels 252 coupled to a pair of side plates 254 and 256, respectively. Rear wheels 252 function to support side plates 254 and 256 along with a mower deck 258 for movement over the ground. Additionally, cutter deck assembly 250 includes a unitary, one-piece roller 260 extending between side plates 254 and 256 a distance less than the entire width of deck 258.”</p> <p><u>'312 Patent col. 7, ll. 53-58:</u> “Cutting deck 290 also</p>	

TABLE OF CLAIM TERMSJOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		<p>includes a pair of rear wheels 302 and a rear segmented roller assembly 304. Rear wheels 302 are pivotally coupled to each of the side plates 296 and 298. Each of the segments of segmented rear roller assembly 304 are rotatably coupled and aligned along an axle 306.”</p> <p><u>'312 Patent col. 7, ll. 59-67:</u> “FIG. 20 depicts yet another cutting deck assembly 308 having a stepped and segmented rear roller assembly 310. Rear roller assembly 310 includes a pair of outboard rollers 312 coupled to side plates 314 and 316. Rear roller assembly 310 also includes an inboard set of rollers 318 positioned between side plates 314 and 316 and rotatably mounted on a stepped axle shaft 320. Rear roller assembly 310 provides a striped pattern having a width greater than the width of a deck 322.”</p> <p><u>'312 Patent Figures 1-9, 11-20 and 22-23:</u> Showing various arrangements of rollers used with cutting decks.</p>	<p>of the front and rear deck assemblies includes a pair of laterally-spaced, generally vertically-extending side plates having forward ends, a first front wheel supporting one of the side plates for movement over the ground, and a second front wheel supporting the other of the side plates for movement over the ground, wherein the rear roller extends between the side plates and supports the side plates for movement over the ground, wherein the associated deck is located between the side plates and in front of the roller and is mounted on the side plates such that the height of the deck relative to the ground is adjustable by changing the position of the deck relative to the side plates. Col. 5:9-22.</p> <p>Claim 7 (relevant representative portions):</p> <p>“one of the cross member ends being connected to one of the side plates of the associated deck assembly for pivotal movement about a generally horizontal, laterally-extending axis adjacent the forward ends of the side plates, and the other of the cross member ends being connected to the other of the side plates of the associated deck assembly for pivotal movement about the generally horizontal, laterally-extending axis, the ends of the cross member having thereon respective downwardly extending arms, the arms having respective lower ends, the lower end of one of the arms being connected to one of the side plates for pivotal movement about the generally horizontal, Col. 6:1-16.</p> <p>Claim 8 (relevant representative portions):</p> <p>“one of the cross member ends being connected to</p>
			36

TABLE OF CLAIM TERMSJOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
			<p>one of the side plates of the associated deck assembly for pivotal movement about a generally horizontal, laterally-extending axis adjacent the forward ends of the side plates, and the other of the cross member ends being connected to the other of the side plates of the associated deck assembly for pivotal movement about the generally horizontal" Col. 6:1-8.</p> <p>Claim 12 (relevant representative portions):</p> <p>A lawn mower as set forth in claim 12 wherein the deck assembly also includes a first front wheel supporting one of the side plates for movement over the ground, a second front wheel supporting the other of the side plates for movement over the ground, and a rear roller extending between the side plates and supporting the side plates for movement over the ground, Col. 8:28-30.</p> <p><u>'312 Patent:</u></p> <p>Claim 19 (relevant representative portions):</p> <p>"a pair of laterally-spaced, generally vertically extending side plates having forward ends;</p> <p>a first front wheel supporting one of said side plates for movement over the ground;</p> <p>a second front wheel supporting the other of said side plates for movement over the ground;</p> <p>a roller extending between said side plates supporting said side plates for movement over the ground, wherein said deck is coupled to said side plates and</p>

TABLE OF CLAIM TERMS**JOINT CLAIM CONSTRUCTION STATEMENT**

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
10.	<u>"each rear deck assembly being aligned with a respective gap between adjacent front deck assemblies"</u>	<p>Proposed Construction</p> <p>The words in this phrase use their ordinary and accustomed meaning and require no construction by the Court. However, if the Court determines that they do require construction, "each rear deck assembly being aligned with a respective gap between adjacent front deck assemblies" means: <i>rear deck assemblies are aligned with the gaps between the front deck assemblies.</i></p> <p>Intrinsic Evidence</p> <p>'530 Patent: claim 1 '311 Patent: claims 1 and 8 '312 Patent: claims 1 and 24</p> <p>Patent Specifications:</p> <p>'530 Patent Abstract: "A gang-type rotary lawn mower including ... at least two side-by-side front rotary cutting deck assemblies mounted on the frame, the front deck assemblies defining a gap between adjacent front deck assemblies, and at least one rear rotary cutting deck assembly mounted on the frame behind the front deck assemblies, each rear deck assembly being aligned with a respective gap between adjacent front deck assemblies..."</p>	<p>Proposed Construction</p> <p>Every rear deck assembly is located behind a gap defined by two adjacent front deck assemblies.</p> <p>Intrinsic Evidence</p> <p>Specifications:</p> <p>Summary of the Invention:</p> <p>"The lawn mower has single-spindle cutting decks attached directly to the frame on which the operator rides, with a front row of two or more cutting decks in front of the front wheels, and with a rear row of one or more cutting decks between the front and rear wheels." Col. 1:27-31.</p> <p>Description of the Drawings:</p> <p>Figure 1 is incorporated herein by reference.</p> <p>Description of the Preferred Embodiment:</p> <p>"The lawn mower 10 further comprises front and rear rows 26 and 30, respectively, of cutting deck assemblies 34. More particularly, in the illustrated construction, the lawn mower 10 has three side-by-side front cutting deck assemblies 34 in front of the</p> <p>'530 Patent col. 4, l. 2 - col. 3, l. 5: The lawn mower 10 further comprises front and rear rows 26 and 30, respectively, of cutting deck assemblies 34. ... As is known in the art, each rear deck assembly 34 is aligned with the gap between two adjacent front deck</p>

TABLE OF CLAIM TERMSJOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		<p>'530 Patent Fig. 1; showing rear cutting deck assemblies (34) being located behind gaps between adjacent front cutting deck assemblies (34).</p> <p>'312 Patent col. 5, ll. 15-22: "Lawn mower 150 preferably includes three side-by-side front cutting deck assemblies 34 in front of the wheels 14 and two rear cutting deck assemblies 152 positioned between the front wheels 14 and in front of the rear wheels 16. Each of the rear cutting deck assemblies 152 is positioned within the gap between two adjacent front deck assemblies 34."</p> <p>'312 Patent col. 6, ll. 54-65: "A rear cutting deck assembly 228 is positioned within the gap between forward cutting assemblies 218. Rear cutting deck assembly 228 is preferably laterally centered between forward cutting deck assemblies 218 to assure that all of the grass across the width of mower 212 is cut. In addition, forward cutting deck assemblies 218 are spread apart a distance less than the cutting width of rear cutting deck assembly 228 to further assure a complete width of cut when mower 212 is turning. Rear cutting deck assembly 228 is aligned with rear wheel 216 such that a first roller 230 and a second roller 232 cooperate with rear wheel 216 to stripe the grass."</p>	<p>front wheels 14, and two rear cutting deck assemblies 34 behind the front wheels 14 and in front of the rear wheels 16. As is known in the art, each rear deck assembly 34 is aligned with the gap between two adjacent front deck assemblies 34." Col. 2:64-Col. 3:5.</p> <p>'312 Patent Specification:</p> <p>"Lawn mower 150 preferably includes three side-by-side front cutting deck assemblies 34 in front of the wheels 14 and two rear cutting deck assemblies 152 positioned between the front wheels 14 and in front of the rear wheels 16. Each of the rear cutting deck assemblies 152 is positioned within the gap between two adjacent front deck assemblies 34." Col. 5:15-22.</p> <p><u>Patent Claims:</u></p> <p>'530 Patent:</p> <p>Claims 1, 7, 8, and 17 (relevant representative portions):</p> <p>"each rear deck assembly being aligned with a respective gap between adjacent front deck assemblies" Col. 4:56-58; Col. 5:52-54; Col. 6:31-33; 65-67.</p> <p>'312 Patent Figs. 1, 7, 8, 12, 16-18: showing rear cutting deck assemblies being located behind gaps between adjacent front cutting deck assemblies.</p> <p>'311 Patent:</p> <p>"at least two front rotary cutting deck assemblies mounted to said frame in front of said front wheels and in a side-by-side relationship, wherein each of</p>

TABLE OF CLAIM TERMS**JOINT CLAIM CONSTRUCTION STATEMENT**

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
11.	"roller"	<p>Proposed Construction</p> <p>The words in this phrase use their ordinary and accustomed meaning and require no construction by the Court. However, if the Court determines that they do require construction, "roller" means: <i>a device that rolls.</i></p> <p>Intrinsic Evidence</p> <p>'530 Patent: claim 1 '311 Patent: claims 2 and 10 '312 Patent: claims 1, 19 and 24</p>	<p>Proposed Construction</p> <p>A rotating device that resists scalping and stripes the grass.</p> <p>Intrinsic Evidence</p> <p>Specification:</p> <p>Background of the Invention:</p> <p>"It is generally recognized that rotary mowers are better suited for cutting tall grass, where scalping is not a problem, while reel mowers are better for shorter cutting." Col. 1:7-9.</p> <p>"Thus, rotary mowers have not been used to cut golf course roughs, which require close trimming and the ability to cut undulating terrain at a relatively short</p>

TABLE OF CLAIM TERMSJOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		<p>across substantially the entire width of the deck. The roller resists scalping and stripes the grass, both of which are aesthetically desirable.”</p> <p>‘530 Patent col. 3, ll. 16-21: “A rear roller 58 extends between the side plates 46 and 48 and also supports the side plates 46 and 48 and the deck 38 for movement over the ground. The roller 58 is behind the deck 38 and extends across substantially the entire width of the deck 38. The roller 58 resists scalping and stripes the grass.”</p> <p>‘530 Patent Figs. 2, 3 & 5: Showing a roller (58) attached to side plates (46, 48) by an axle (unnumbered).</p> <p>‘312 Patent col. 5, ll. 60-65: “A continuous, unitary roller 174 extends between side plates 162 and 164 and also supports side plates 162 and 164 and deck 160 for movement over the ground. In this embodiment, roller 174 is positioned behind deck 160 and extends substantially across the entire width of deck 160.” Col. 5:60-65.</p> <p>‘312 Patent col. 6, ll. 20-41: “An alternate embodiment cutter deck assembly 198 is depicted in FIG. 11. A segmented first roller 200 is positioned behind a deck 201 laterally extending a distance less than the width of deck 201. Segmented roller 200 includes a plurality of roller segments 200A, 200B, 200C and 200D. . . . A second roller 202 is positioned forward of first roller 200. Second roller 202 is coupled to a side plate 203 and generally aligned with an outside edge of deck 201. A third roller 204 is aligned laterally with second roller 202 and</p>	<p>length.” Col. 1:16-19.</p> <p>Summary of the Invention:</p> <p>The Summary of the Invention describes the invention as including a roller that resists scalping and stripes the grass.</p> <p>“The invention provides a gang-type rotary lawn mower suitable for cutting a golf course rough.” Col. 1:23-24.</p> <p>“The roller resists scalping and stripes the grass, both of which are aesthetically desirable.” Col. 1:55-56.</p> <p>“This construction enables the lawn mower to cut the undulating terrain of a golf course rough and to be controlled for close trimming.” Col. 2:4-8.</p> <p>Description of the Drawings:</p> <p>Figures 1-24 are incorporated herein by reference.</p> <p>‘312 Patent:</p> <p>“A continuous, unitary roller 174 extends between side plates 162 and 164 and also supports side plates 162 and 164 and deck 160 for movement over the ground. In this embodiment, roller 174 is positioned behind deck 160 and extends substantially across the entire width of deck 160.” Col. 5:60-65.</p> <p>“A segmented first roller 200 is positioned behind a deck 201 laterally extending a distance less than the width of deck 201. Segmented roller 200 includes a plurality of roller segments 200A, 200B, 200C and 200D. . . . A second roller 202 is positioned forward of first roller 200. Second roller 202 is coupled to a side plate 203 and generally aligned with an outside edge of deck 201. A third roller 204 is aligned laterally with second roller 202 and</p>

TABLE OF CLAIM TERMSJOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		<p>positioned forward of first roller 200. Third roller 204 is coupled to a side plate 205 and generally aligned with an outside edge of deck 201. First roller 200, second roller 202 and third roller 204 are positioned to define a substantially uninterrupted rolling path 206 to provide an aesthetically pleasing striping of the grass. Second roller 202 and third roller 204 may be sized such that a portion of each of these rollers overlaps first roller 200. Alternatively, an inner edge 208 of second roller 202 may be aligned with an outer edge 210 of first roller 200 to provide the substantially uninterrupted roller path.”</p>	<p>plurality of roller segments 200A, 200B, 200C and 200D. It should be appreciated that segmented first roller 200 may include any number of roller segments without departing from the scope of the present invention. A second roller 202 is positioned forward of first roller 200. Second roller 202 is coupled to a side plate 203 and generally aligned with an outside edge of deck 201. A third roller 204 is aligned laterally with second roller 202 and positioned forward of first roller 200. Third roller 204 is coupled to a side plate 205 and generally aligned with an outside edge of deck 201. First roller 200, second roller 202 and third roller 204 are positioned to define a substantially uninterrupted rolling path 206 to provide an aesthetically pleasing striping of the grass. Second roller 202 and third roller 204 may be sized such that a portion of each of these rollers overlaps first roller 200. Alternatively, an inner edge 208 of second roller 202 may be aligned with an outer edge 210 of first roller 200 to provide the substantially uninterrupted roller path.” Col. 6:20-42.</p>
		<p>‘312 Patent col. 6, ll. 42-53: “With reference to FIG. 12, a three-wheeled mower 212 includes two forward wheels 214 and one rear wheel 216. Two forward cutting deck assemblies 218 are aligned with each of the wheels 214 in the longitudinal (forward-rearward) direction of travel and laterally aligned with each other. Each of cutting deck assemblies 218 includes a pair of segmented rollers 220 aligned along an axis of rotation 222 and laterally spaced apart from one another a predetermined distance 224. Each of the forward wheels 214 is aligned with the space between rollers 220 such that the combination of rollers 220 and wheel 214 form a rolling path 226 to provide the striping effect.”</p>	<p>“Each of cutting deck assemblies 218 includes a pair of segmented rollers 220 aligned along an axis of rotation 222 and laterally spaced apart from one another a predetermined distance 224. Each of the forward wheels 214 is aligned with the space between rollers 220 such that the combination of rollers 220 and wheel 214 form a rolling path 226 to provide the striping effect.” Col. 6:47-53.</p>
		<p>‘312 Patent col. 6, ll. 62-65: “Rear cutting deck assembly 228 is aligned with rear wheel 216 such that a first roller 230 and a second roller 232 cooperate with rear wheel 216 to stripe the grass.”</p>	<p>“Rear cutting deck assembly 228 is aligned with rear wheel 216 such that a first roller 230 and a second roller 232 cooperate with rear wheel 216 to stripe the grass.” Col. 6:62-65.</p>

TABLE OF CLAIM TERMS**JOINT CLAIM CONSTRUCTION STATEMENT**

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		<p>236 aligned and rotatably mounted to axle 238. Axle 238 is coupled to a first side plate 242 and a second side plate 244. Accordingly, rollers 236 support the side plates and a deck 245 for movement over the ground. Rollers 236 are preferably axially spaced apart a predetermined distance along axle 238 to provide an alternate striping effect. It should be appreciated that rollers 236 are positioned such that they do not extend substantially across the entire width of a mower deck 245. In similar fashion and in reference to FIG. 14, a single one-piece unitary roller 246 may be incorporated to support the side plates and deck. Roller 246 does not extend the entire width of the mower deck.”</p> <p><u>‘312 Patent col. 7, ll. 19-22:</u> “Additionally, cutter deck assembly 250 includes a unitary, one-piece roller 260 extending between side plates 254 and 256 a distance less than the entire width of deck 258.”</p>	<p>“Another cutting deck assembly is depicted at reference numeral 234 in FIG. 13. Cutting deck assembly 234 includes a plurality of separate rollers 236 aligned and rotatably mounted to axle 238. Axle 238 is coupled to a first side plate 242 and a second side plate 244. Accordingly, rollers 236 support the side plates and a deck 245 for movement over the ground. Rollers 236 are preferably axially spaced apart a predetermined distance along axle 238 to provide an alternate striping effect. It should be appreciated that rollers 236 are positioned such that they do not extend substantially across the entire width of a mower deck 245. In similar fashion and in reference to FIG. 14, a single one-piece unitary roller 246 may be incorporated to support the side plates and deck. Roller 246 does not extend the entire width of the mower deck.” Col. 7:1-13.</p> <p>Patent Claims:</p> <p><u>‘312 Patent col. 7, ll. 23-33:</u> “Referring to FIGS. 16-18, each of the forward and rear cutting deck assemblies may be positioned relative to another in a number of ways. Specifically, a forward cutting deck assembly 262 includes a roller 264 having an inboard edge 266 which may be positioned in an overlapping relationship with a rear cutting deck assembly 267 having a roller 268 with an outboard edge 269. As phantom line 270 represents, inboard edge 266 of forward cutting deck assembly 262 overlaps outboard edge 269 of rear cutting deck assembly 267 to create the appearance of one continuous roller stripe.”</p> <p><u>‘312 Patent col. 7, ll. 34-42:</u> “Similarly, with reference to FIG. 17, an inboard edge 271 of a roller</p> <p>“rear roller extends between the side plates and supports the side plates for movement over the ground,” Col. 5:16-18; Col. 8:32-35.</p>

TABLE OF CLAIM TERMS

JOINT CLAIM CONSTRUCTION STATEMENT

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		<p>272 may be longitudinally aligned with an outboard edge 274 of a roller 276. Accordingly, the cutting deck positions depicted in the Figure provide a substantially continuous roller stripe. As shown in FIG. 18, an inboard edge 278 of a roller 280 may be offset from an outboard edge 282 of a roller 284 as depicted by phantom line 286. In this manner, an interrupted stripe is formed in the grass as the rollers pass over.”</p> <p>‘312 Patent col. 7, ll. 53-58: “Cutting deck 290 also includes a pair of rear wheels 302 and a rear segmented roller assembly 304. Rear wheels 302 are pivotally coupled to each of the side plates 296 and 298. Each of the segments of segmented rear roller assembly 304 are rotatably coupled and aligned along an axle 306.”</p> <p>‘312 Patent col. 7, ll. 59-67: “FIG. 20 depicts yet another cutting deck assembly 308 having a stepped and segmented rear roller assembly 310. Rear roller assembly 310 includes a pair of outboard rollers 312 coupled to side plates 314 and 316. Rear roller assembly 310 also includes an inboard set of rollers 318 positioned between side plates 314 and 316 and rotatably mounted on a stepped axle shaft 320. Rear roller assembly 310 provides a striped pattern having a width greater than the width of a deck 322.”</p> <p>‘312 Patent col. 8, ll. 7-9: “FIG. 22 includes a “V” shaped offset, segmented roller assembly 328 similar to the assembly shown in FIG. 20 and depicted at reference numeral 310.”</p> <p>‘312 Patent Figures 1-9, 11-20 and 22-23: Showing</p>	<p><u>Prosecution History:</u></p> <p>‘530 Patent:</p> <p>Paper 6, 11, 15.</p>

TABLE OF CLAIM TERMS**JOINT CLAIM CONSTRUCTION STATEMENT**

#	Claim Term	Plaintiff's Proposed Construction	Defendant's Proposed Construction
		various arrangements of rollers used with cutting decks.	